all prior taxes on property have been paid, is in conflict with a constitutional provision against deprivation of property without due process of law. Hanley, P. J., *dissenting.*

That a legislature is competent to declare certain documents presumptive or prima facie evidence is everywhere admitted. *Pillow v. Roberts,* 13 How. 472; *Allen v. Armstrong,* 16 Iowa 508, but the opposite is universally held in regard to the power of a legislature to make such documents conclusive evidence of their own contents. *Cooley on Taxation,* 298; *Abbott v. Lindenbower,* 42 Mo. 162; *Kelley v. Herrall,* 10 Saw. 169; *McCready v. Sexton,* 29 Iowa 356. On the other hand, the universal doctrine that a statute will not be declared unconstitutional, except where the conflict between its provisions and the organic law is so palpable as to leave no doubt of its validity, and the fact that there is a substantial distinction between a tax deed being conclusive evidence of its own recitals, and a law making it conclusive evidence that an officer has done his duty, leads several of the States to hold that under these circumstances the legislature can make a tax deed conclusive evidence that all prior taxes have been paid. *Rollins v. Wright,* 93 Cal. 397; *Phelps v. Meade,* 41 Iowa 470.

CONSTITUTIONAL LAW—EVIDENCE—SELF-INCRIMINATING TESTIMONY.—PEOPLE V. ADAMS, 68 N. E. 636 (N. Y.).—Officers, under a search warrant, seized policy sheets and private papers which were used to prove the handwriting of the defendant and that the offices were occupied by him. *Held,* that this was not in violation of the constitution, as compelling the accused to tesify against himself.

This is in harmony with the great weight of authority that private property, though illegally procured, is admissible in evidence in a criminal action. *Siebert v. Illinois,* 143 Ill. 571; *State v. Griswold,* 67 Conn. 290; *Commonwealth v. Welsh,* 110 Mass. 359, and the remedy for such unlawful taking is an independent suit. *Commonwealth v. Tibbits,* 157 Mass. 519. *Contra, Boyd v. United States,* 110 U. S. 616, which distinguishes between the compulsory production of private property, such as seizure of smuggled goods, or private papers, as circumstantial evidence of the existence of such matters, and the compulsory production of private papers as evidence of the truth of their contents, holding that in the former case there is no self-incriminating evidence, as the things are merely evidence as such; while in the latter case, it is equivalent to making the accused testify against himslf, and is therefore unconstitutional. In point with the main case is *State v. Hial Mathers,* 64 Vt. 101, where an incriminating letter, illegally obtained, was admitted in evidence in a criminal action.

CONSTITUTIONAL LAW—INFANTS—FAILURE TO FURNISH MEDICAL ATTENDANCE.—PEOPLE V. PIERSON, 68 N. E. 243 (N. Y.).—Defendant did not call in a licensed physician to attend the dangerous illness of an adopted daughter, but depended upon faith to cure her. *Held,* the provisions of the Penal Code, making it a misdemeanor to omit to furnish medical attendance to a minor does not violate the constitutional provision guaranteeing freedom of worship.

A defense of religious belief cannot be set up to a violation of a law of public health: *Reg. v. Downes,* 13 Cox C. C. 111; nor of public policy; *State*